# Supporting Statement for Paperwork Reduction Act Submission
# OMB Control Number 1018-0111

## Summary Information for Ranking National Coastal Wetlands Grant Program Proposals
## 50 CFR 84
## FWS Form 3-2179
## September 17, 2004

### A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Grants authorized under the Coastal Wetlands Planning, Protection and Restoration Act (16 U.S.C. 3951) and regulations at 50 CFR 84 require the submission of proposals by potential grantees. Grantees include many types of information in their proposals in any format they choose. The proposed information collection form (FWS Form 3-2179) allows the grant applicants to summarize and organize the information contained in their grant proposal in a manner where individuals who rank the proposals can compare and contrast them on equal terms. It saves the ranking panel's time by organizing grant proposal information in a manner that allows for a fair ranking of proposals.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

Coastal State grant applicants use this form to organize proposal information in a concise, ordered way. Applicants can also use this form to highlight habitat and species that would benefit and the degree to which they would benefit, from the proposed project. The information collected includes summarized information on habitat, coastal barriers, levels of conservation, watershed management, threatened and/or endangered species potentially involved, benefits of the restoration proposed, partners, cost sharing, education/outreach impact, impact on wildlife-oriented recreation, and other benefits. Because grant applicants complete the summary information, the information is a thorough and accurate summary of the proposal. Each question on the form is used to determine scoring and ranking of the applicants. The Fish and Wildlife Service uses the scoring and ranking determinations to make program funding decisions.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements.].

The Service is moving toward electronic collection of most grant information collections. At present, only SF 424 (Application for Federal Assistance), FWS Form 3-1552 (Grant Agreement), FWS Form 3-1591 (Amendment to Grant Agreement), and some financial information are automated. Over the next few years, we plan to automate most grant information collections, including proposals. Exceptions to this will involve photographs and large maps. The form for this information collection (FWS Form 3-2179) is available online and is in a fillable format. This form can also be submitted via email. In future years, this form will be available on grants.gov for electronic completion and submission.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

No similar information is collected by the Fish and Wildlife Service or any other Federal agency.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

There is no impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information were not collected it would be extremely time-consuming to rank grant proposals. There is the possibility that ranking panel members would miss technical details in the grant if the information were not summarized by the proposal writer for a fair and equal comparison. Every question on the form is used to determine scoring and ranking of the applicants. The scoring and ranking determinations are used to make program funding decisions.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
   * requiring respondents to report information to the agency more often than quarterly;
   * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
   * requiring respondents to submit more than an original and two copies of any document;
   * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
   * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
   * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
   * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances. This is not a statistical survey.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

   Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

   Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 14, 2004, we published a notice in the Federal Register (69 FR 26877) announcing that we planned to submit a request to OMB to renew this information collection under the Paperwork Reduction Act of 1995. In that notice, we solicited public comments for 60 days, ending July 13, 2004. By that date, we received one comment, which was editorial in nature. The commenter expressed concern that more land needs to be conserved, but did not comment on the merits of this information collection. We have not made any changes to our information collection as a result of this comment.

All of our Regional Offices and, through them, our State agency clientele were involved in the original design of the form. During the process to renew OMB approval, additional comments were solicited from the following individuals outside the Service who have experience with this form:

Moira McEnespy; Grants Specialist; State of California; mmcenespy@scc.ca.gov
Jennifer Smith; Grants Specialist, State of California; Jsmith@dfg.ca.gov
Ken Bierly; Grants Manager; State of Oregon; Ken.Bierly@state.or.us
Don Kraege; Grants Manager; State of Washington; KRAEGDKK@dfw.wa.gov

All of the responses indicated that the information we collect is necessary and appropriate and that the reporting burden is not excessive.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable. We do not provide any gifts or payments to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No pledge or promise of confidentiality of any kind is made to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are asked of any respondent.

12. Provide estimates of the hour burden of the collection of information. The statement should:

* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

| Form No. | Annual Number of Respondents | Annual No. of Responses | Hour Burden Per Response | Annual Burden | Hourly Cost for Respondent | Financial Burden on Respondents |
|---|---|---|---|---|---|---|
| 3-2179 | 35 | 35 | ½ hour | 17.5 hours | $25.00 | $12.50 each or $437.50 total |

The above numbers were estimated by studying the number of grant applications received in previous fiscal years.

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Not applicable.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

| Fish and Wildlife Service | Printing of Forms | Mailing | Management of Information Collection | Data Entry | File Maintenance |
|---|---|---|---|---|---|
| Non-Electronic Collection Cost | $10. Annual | $100. Annual | $100. Annual | $10. Annual | $10. Annual |
| Electronic Collection Cost | 0 | 0 | Negligible | 0 | Negligible |
| Management of Information at $35 per hour | 0 | 0 | 1 hour each per 35 responses = $1,225.00 annually | 0 | 0 |

These costs were estimated by maintaining close contact with grant applicants and by discussing with them the burden times used to fill out the form and costs associated with that time.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The number of respondents has increased by one; therefore, the burden hours have increased by 1/2 hour.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

No publication of this data is planned. The form is simply a tool used to help rank proposals.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Service is not seeking a waiver from the requirement to display the expiration data of the OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to any of the items listed on #19 of the 83-I.

**B. Collections of Information Employing Statistical Methods**

This collection does not employ statistical methods.